



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 29, 2020

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

The government provides supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure and additional pretrial disclosures.

The government previously produced, by letter dated May 1, 2019, a scanned copy of handwritten notes seized by Bulgarian authorities from the defendant's apartment (ZHU000057). Enclosed is a final translation of that document, Bates-stamped **ZHU006591**.

Enclosed please also find the following:

- Records from Linode, Bates-stamped **ZHU006592 to ZHU006607**;
- Travel records, Bates-stamped **ZHU006608**; and
- Two emails, in a file folder Bates-stamped **ZHU006609**.

The government previously produced, by letter dated August 12, 2019, a search warrant and underlying application for a server associated with the IP address 178.58.122.237 (ZHU000278). The government hereby provides notice that its expert, LL, may testify regarding the contents of that server; her analysis of the server is enclosed as 3500-LL-4 and a copy of the server is being provided to you on a USB drive.

The government also previously disclosed, in the complaint in this matter, that it obtained a "git" related to the defendant's scheme. ECF No. 1, ¶¶ 38-39. The government previously produced, by letters dated May 1, 2019 and June 11, 2019, hard drives containing a complete version of the git. A copy of an earlier version of the git—the contents of which

